

Exhibit 16

Nebraska Proposals

MDL 3047 – 2024-12-09 Agency Discovery JLB
Nebraska – Meta Proposal

Search Terms: On November 22, 2024, Meta made its most recent counterproposal on to the Nebraska Department of Health and Human Services, Department of Education, Governor's Office, Department of Economic Development, and Children's Commission.

Meta's proposal requested that agencies focused on youth issues—*i.e.*, the Department of Education and Children's Commission—run search strings # 1-15 as-is, without any combinations or connectors. For agencies that do not focus primarily or exclusively on youth issues—*i.e.*, the Department of Health and Human Services, Governor's Office, and Department of Economic Development—Meta proposed further limiting each string by requiring one of the following "Youth Terms" to occur in the same document:

(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR "under-age" OR juvenile* OR "pre-teen*" OR preteen* OR "U18" OR "under 18" OR "U13" OR "under 13" OR "gen* z" OR "gen-z" OR "gen* alpha" OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*)

Search Set 1 – Search Strings for Youth Focused Agencies	
1	("social media" OR "social network" OR "Meta" OR Facebook OR Instagram OR "Insta" OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR telegram OR signal OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR YikYak OR "Yik Yak" OR finsta OR FB OR IG OR YT OR TT OR DM* OR "direct message")
Search Set 2 – Youth Mental Health / Wellbeing Issues	
2	wellness OR wellbeing OR well-being OR confidence OR self-confidence OR "mental health" OR "TMH" OR "ACE*" OR "adverse childhood experience" OR anxi* OR anti-anxi* OR depress* OR antidepress* OR sad* OR reclus* OR stress OR "attention deficit" OR "ADHD" OR posttraumatic OR "bi-polar" OR "bi polar" OR bipolar OR "BPD" OR insomnia OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone OR therap* OR counsel* OR treatment*)
3	("pro-ana" OR "BMI" OR overweight OR fat OR obes* OR diet* OR anorexi* OR bulimi* OR orthorexi* OR appetite OR dysmorph* OR binge OR purge OR suicid* OR "self harm" OR "self-harm" OR selfharm OR unalive OR cutting*)
4	(bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR saxis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR sex* OR extort OR exploit*)

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5	(violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR misconduct* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate*)
6	(addic* OR hook* OR dopamine OR rabbithol* OR spiral OR “social reward” OR “social approval” OR “screen time” OR screentime staytime OR timespent OR “time spent” OR “engagement” OR impression* OR “monthly active users” OR “daily active users” OR “monthly active people” OR “daily active people” OR “weekly active users” OR “mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”)
7	(eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
8	(sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
9	(negative w/3 (appearance OR experience OR affect* OR effect*))
10	(compar* w/5 (appearance OR social OR other* OR negative))
11	(body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*))
12	(self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*))
13	(Covid* OR coronavirus OR pandemic OR lockdown OR “lock* down” OR quarantine OR “social* distanc*”)
14	(svap* OR “ecig” OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul)
	Search Set 3 – Other Case Issues
15	(polic* OR practice* OR presentation OR assembl* OR initiative* OR interven* OR prevent* OR limit* OR control* OR legislation OR advocacy OR lobby* OR legislat* OR law OR suspend* OR revok* OR fine* OR sanction* OR cancel* OR abandon* OR ban OR banned OR banning OR concern* OR problematic OR investigat* OR criminal OR charges OR conviction* OR arrest* OR “law enforcement” OR deceptive OR decei* OR fraud* OR defraud* OR cheat* OR lie* OR misrepresent* OR mislead* OR schem* OR exploit* OR trick* OR conceal* OR hide OR omit* OR downplay* OR suppress* OR “cover up” OR “Consumer Protection Act” OR “consumer protection”)

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Custodians: Meta proposes that the above search terms be run on each agency’s custodial documents (including email and other custodial data sources), and relevant non-custodial data sources, that cover the entire period from January 1, 2012, to April 1, 2024, which encompasses the same time period from which Plaintiffs seek discovery, and have plead as the “Relevant Time[]” in Plaintiffs’ Complaint. *See* ECF No. 969; MDL Compl. ¶ 19 (alleging a “Relevant Time[]” that starts “no later than 2012”).

Custodians designated with an asterisk (*) have been affirmatively proposed and agreed to by the Nebraska AG’s office during the course of the Parties’ negotiations. To the extent that the custodians below do not cover the relevant time period or all relevant topics for each agency, the State and/or agency should propose additional custodians to Meta, and Meta reserves the right to select additional custodians.

Agency	Custodian	Title
Department of Education	Zainab Rida*	Equity Officer & Office Administrator, Coordinated Student Support Services
Department of Education	Dorann Avey*	Director, Digital Learning
Department of Education	Jay Martin*	Director, School Safety
Department of Education	David Jespersen*	Office Administrator, Public Information & Communications
Department of Health and Human Services	Anthony “Tony” Green*	Director, Division of Developmental Disabilities; Interim Director, Division of Behavioral Health
Department of Health and Human Services	Charity Menefee*	Director, Division of Public Health
Department of Health and Human Services	Shannon Grotrian *	Director, Office of Economic Assistance
Department of Health and Human Services	Dr. Thomas Janouse	Director Division of Behavioral Health
Department of Health and Human Services	Alyssa Bish*	Director, Division of Children & Family Services

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Agency	Custodian	Title
Department of Health and Human Services	Linda Witmuss*	Deputy Director, Division of Behavioral Health
Department of Health and Human Services	Timothy Tesmer*	Chief Medical Officer
Department of Health and Human Services	Matt Ahern*	Interim Director, Division of Medicaid & Long-Term Care
Department of Health and Human Services	Charity Menefee	Director Division of Public Health
Children’s Commission	Adam Anderson*	Staff Member
Children’s Commission	Sage Leis*	Staff Member*
Governor’s Office	Laura Strimple	Director of Communications
Governor’s Office	David Lopez	Chief of Staff
Governor’s Office	Kenny Zoeller	Director of the Policy Research Office
Department of Economic Development	Joe Fox	Deputy Director of Business Development & Programs

I. Search Strings for Nebraska Department of Education

<i>Search Set 1 – Youth Use of Social Media</i>	
1.	(teen OR teenage OR teenager) w/10 (“social media” OR “social network”)
<i>Search Set 2 – Youth Mental Health</i>	
2.	(teen OR teenage OR teenager) w/10 (wellness OR wellbeing OR well-being OR “mental health” OR anxi* OR depress* OR antidepress* OR posttraumatic OR “bi-polar” OR “bi polar” OR bipolar OR “BPD” OR insomnia)
3.	(teen OR teenage OR teenager) w/10 (“BMI” OR overweight OR “fat” OR obes* OR diet OR anorexi* OR bulimi* OR orthorexi* OR appetite OR dysmorphia OR binge OR purge OR suicid* OR “self harm” OR “self-harm” OR selfharm OR unalive OR cutting)
4.	(teen OR teenage OR teenager) w/10 (bully* OR bullie* OR cyberbully* OR sextort* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR extort OR exploit*)
5.	(teen OR teenage OR teenager) w/10 (violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff*)
6.	(teen OR teenage OR teenager) w/10 (addic* OR dopamine OR rabbithol* OR “social reward” OR “social approval” OR “screen time” OR screentime OR timespent OR “time spent” OR “engagement” OR impression* OR “monthly active users” OR “daily active users” OR “monthly active people” OR “daily active people” OR “weekly active users” OR “mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”)
7.	(teen OR teenage OR teenager) w/10 (eat* w/3 (disorder* OR disab*))
8.	(teen OR teenage OR teenager) w/10 (sleep* w/3 (difficult* OR disorder* OR disab* OR insufficient OR depriv*))
9.	(teen OR teenage OR teenager) w/10 (negative w/3 (experience OR affect* OR effect*))
10.	(teen OR teenage OR teenager) w/10 (compar* w/3 (social OR negative))
11.	(teen OR teenage OR teenager) w/10 (“body dissatisfaction” OR “body positivity” OR “body positive” OR “body image”)

12.	(teen OR teenage OR teenager) w/10 (self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*))
13.	(teen OR teenage OR teenager) w/10 (Covid* OR coronavirus OR pandemic OR lockdown OR “lock* down” OR quarantine OR “social* distanc*”)
14.	(teen OR teenage OR teenager) w/10 (“ecig” OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul)

<i>Search Set 3 – Other Case Issues</i>	
15.	(deceptive OR fraud OR “Consumer Protection Act” OR “consumer protection”)
16.	(“social media” OR “social network” OR “mental health”) w/10 (legislation OR advocacy OR lobby OR legislate OR unicameral)

II. Search Strings for Other Agencies

Nebraska Department of Administrative Services

These search terms will be run on the two file folders containing agency fiscal notes and budgetary materials:

1.	(social media OR social network OR Meta OR Facebook OR Instagram)
2.	(teen OR tween OR adolescent OR adolescence OR kid OR kids OR youth OR minor OR minors OR young OR child OR children OR underage OR “under-age” OR juvenile OR “pre-teen” OR “under 18” OR U18 OR “under 13” or U13 OR “gen z” OR “gen-z” OR “gen alpha”)

Manual Search or “Go Get’Em” – No Custodians:

NE DAS – “Go get’em approach. No custodians. Not included in letter brief.

NE DED – Manual collection. No custodians. Meta disagrees. (Similar to NE DAS.)

NE Governor’s Office – Manual collection. No custodians. Meta disagrees.

NE DHHS – Manual collection. No custodians. Meta disagrees. (We did provide a list of bureau heads that conducted the search. **NOT CUSTODIANS.**)

Custodians – Meta Agrees as to Both

NE DOE – Four custodians. Meta agrees.

- Zainab Rida – Equity Officer & Office Administrator, Coordinated Student Support Services
- Jay Martin – Director, School Safety
- Dorann Avey – Director, Digital Learning
- David Jespersen – Office Administrator, Public Information & Communications

NE Children’s Commission – Two custodians. Meta agrees. (Only two staff employees.)

- Adam Anderson
- Sage Leis